

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Loula Wilson Johnson to appear and plead, answer or demur, within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, In Equity, by Woodrow Wilson, as complainant, against Loula Wilson Johnson, as respondent.

Witness my hand this 27th day of Nov, 1953.

Alfred. Duke  
Register.

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TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY,  
AND TO THE HONORABLE H. M. HALL, JUDGE THEREOF:

FIRST:

SECOND:

THIRD:

That in and by the terms of the divorce decree referred to above the Respondent herein was awarded the care, custody and control of the minor daughters named above and although said decree was silent as to the custody of the minor sons it was understood that your Complainant herein was to have such care, custody and control.

That notwithstanding the terms of the decree referred to above the Respondent has never had the care, custody and control of said minor daughters but they have remained in the custody of your Complainant with the consent and acquiescence of the Respondent who has never, during the last four years, made any attempt to enforce the provisions of said decree relative to the custody of said daughters until, to-wit: November 24, 1953, when she informed said children that she was coming to the home of the Respondent to get them and take them home with her.

FOURTH:

That both your Complainant and the Respondent have remarried and the Respondent has had two children by this latter marriage who are of very tender ages. That your Complainant's present wife has cared for and provided for the said daughters and treated them, in all respects, as if they were her own, and said daughters are apparently happy in their present home and have expressed to your Complainant their desire to remain in his care and custody and unwillingness to live in the home of their mother or to change their present home. That your Complainant has no other children than those named above and is gainfully employed and able to provide said children with a proper home and all the necessities.

FIFTH:

That in view of the facts averred above your Complainant alleges that there has been a change of circumstances since the rendition of the decree referred to above and that it would be to the best interest of the said minor children if they were allowed to remain with your Complainant in his home.

PRAYER FOR PROCESS

The premises considered your Complainant respectfully prays that your Honor will cause the usual writ of process to issue out of this Court notifying the Respondent of the filing of this Petition and requiring her to plead, answer or demur to the same within the time required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Your Complainant further prays that upon a final hearing hereof that your Honor will enter an order or decree amending the divorce decree hereinabove referred to insofar as the provision thereof re-

lative to the custody of said minor daughters is concerned and will, in and by the terms of said decree award to your Complainant the care, custody and control of said minor daughters, Georgia Mae Wilson, Mary Lou Wilson and Peggy Ann Wilson; and your Complainant prays for such other, further and different orders and decrees as in equity will be meet and proper.

Respectfully Submitted,

Woodrow Wilson  
Complainant.

Sworn to and Subscribed  
before me this 27<sup>th</sup> day of  
November, 1953.

J. A. Madaleno Jr.  
Notary Public, Baldwin County, Ala.

THE STATE OF ALABAMA, }  
Baldwin County

No. 3148 Circuit Court, In Equity.

WOODROW WILSON

Complainant...

Vs.

LOULA WILSON JOHNSON

Defendant....

Motion is hereby made for a Decree Pro Confesso against Loula Wilson Johnson

Defendant....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant....; and that said summons was duly served according to law, and that said Defendant... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 14th day of January 19 54



Norborne C. Stone

Solicitor.

No. 3148 Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, In Equity

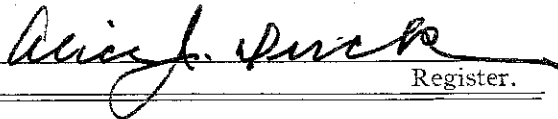
WOODROW WILSON

Vs.

LOULA WILSON JOHNSON

Motion for Decree Pro Confesso on  
Personal Service

Filed January 14, 1954

  
Register.

Recorded in Record

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